

Karen Ericson

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1
2 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
3 CASE No. 07 CV 3219 (LTS)
4 - - - - -x
5 GMA ACCESORIES, INC.,
6 Plaintiff,
7 -against-
8 CHARLOTTE SOLNICKI, CHARLOTTE B, LLC, EMINENT,
INC., SAKS FIFTH AVENUE, INC., INTERMIX, INC.,
9 WINK NYC INC., LISA KLINE, INC., GIRLSHOP,
INC., SHOWROOM SEVEN STUDIOS, INC., ELECTRIC
10 WONDERLAND, INC., SHOWROOM SEVEN INT'L,
SHOWROOM SEVEN, JONATHAN SINGER, GOSI
11 ENTERPRISES, LTD., TIERNEY DIRECT, LLC, and
JONATHAN SOLNICKI, CHARLOTTE SOLNICKI, et al.,
12
13 Defendants. COPY
- - - - -x
14
15
16 DEPOSITION OF KAREN ERICSON
17 New York, New York
18 May 22, 2008
19
20
21 REPORTED BY:
22 DANIELLE GRANT
23 JOB NO. 203307
24
25

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2 K A R E N E R I C S O N, called as a witness,
3 having been first duly sworn by Danielle
4 Grant, a Notary Public within and for the
5 State of New York, was examined and
6 testified as follows:

7 DIRECT EXAMINATION BY

8 MR. BOSTANY:

9 Q Can I your name for the record.

10 A Karen Ericson.

11 Q Can I have your address for the
12 record?

13 A I have to ask. 436 West 20th,
14 Apartment One.

15 Q Zip code?

16 A I have to ask.

17 Q Okay. No problem.

18 A 10011.

19 Q Are you currently employed?

20 A Yes.

21 Q Where?

22 A Showroom Seven.

23 Q What is the address?

24 A 263 Eleventh Avenue.

25 Q Zip code?

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2 A 10001.

3 Q How long have you been at that
4 address?

5 A Since April.

6 Q Of this year?

7 A Um-hmm.

8 Q What address was Showroom Seven
9 before that?

10 A 498 Seventh Avenue.

11 Q City and zip code?

12 A New York City, New York, 10018.

13 Q How long was Showroom Seven at that
14 address?

15 A Twelve years, maybe, I'm not sure.

16 Q What is your position?

17 A I'm a manager.

18 Q Do you know who the president is or
19 the vice president?

20 A John Mark.

21 Q John Mark Flack?

22 A Yes.

23 Q What is his title?

24 A President.

25 Q Do you know who the vice president

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1 KAREN ERICSON
2 is?
3 A No.
4 Q Are there any other officers besides
5 him that you know of?
6 A Mandy Ericson.
7 Q Is she related to you?
8 A My daughter.
9 Q What's her position?
10 A I'm not sure.
11 Q Any other officers besides those
12 two?
13 A I'm don't think so.
14 Q Were you ever an officer?
15 A Yes.
16 Q When did you cease being an officer?
17 A I don't remember.
18 Q Within the last five years?
19 A Yeah, I would think so.
20 Q Before or after 2004?
21 A I don't remember.
22 Q Before or after 2002?
23 A I don't remember.
24 Q What why did you cease being an
25 officer?

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2 So, if you talk at the same time as I do, she
3 has to pick which one she's going to type the
4 words of. And if she picks me, then we don't
5 see what your words are, and if she picks you,
6 then nobody sees my words. That's why you have
7 to wait.

8 The other thing is you should give
9 answers based upon your own personal knowledge.
10 That means if you have personal knowledge of
11 the answer, you should give the answer. If you
12 know what the answer is, but it's based on what
13 someone else told you or something you may have
14 heard, you have to say that in your answer. Do
15 you understand those instructions?

16 A Yes.

17 Q Now, the documents I was allowed to
18 inspect in the stairwell on May 15th, how is it
19 you were producing them and how is it you had
20 ownership of them?

21 A Showroom Seven is a sales agency,
22 and when we write purchase orders on behalf of
23 clients, we keep records.

24 Q So, then is it your testimony that
25 these sales orders, or purchase orders, that you

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2 default judgement being entered against Showroom
3 Seven?

4 A I never knew there was one.

5 Q Did you ever see a copy of the Third
6 Amended Complaint?

7 A No.

8 Q I'm going to show you a summons
9 April 2, 2008, and a Third Amended Complaint
10 dated April 1, 2008 and ask you if you have ever
11 seen that document that was served upon Electric
12 Wonderland Inc. via the Secretary of State, that
13 Electric Wonderland Inc. never answered, and that
14 Electric Wonderland Inc. is in default of, have
15 your seen those documents?

16 A I don't know.

17 Q Do you have anything to do with
18 Electric Wonderland?

19 A Electric Wonderland is just a
20 corporation.

21 Q Are you an officer of that
22 corporation?

23 A No.

24 Q Okay.

25 *KARIM KAMAL*
~~ARBITRATOR ALBALAH~~: Let the record

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2 reflect that the witness is leafing
3 through the Third Amended Complaint and
4 Summons.

5 Q Those are yours to keep, I'm not
6 taking them back, I'm not marking them. Your
7 attorney has already written to me several times
8 indicating he is aware that Electric Wonderland
9 Inc. is in default, and I don't know if he's
10 informed you, but now I have.

11 ~~ARBITRATOR ALBALAH~~ ^{Karim Kamal} Let the record
12 reflect the witness is conferring with
13 her counsel and that's against the rules.
14 You must only do that during a break,
15 please.

16 Q If you had to estimate the amount of
17 profit, the aggregate amount of profit your
18 company made on the sales -- let me ask you
19 this -- withdrawn.

20 When these customers came into
21 your premises?

22 A Say again, sorry. When what
23 customers?

24 Q Withdrawn.

25 You testified earlier that the